

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

Ophelia Azriel De'lonta,
Plaintiff,

v.

Harold W. Clarke, *et al.*,
Defendants.

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Civil Action No. 7:11-cv-00257

REPORT OF THE PARTIES' RULE 26(F) CONFERENCE

1. The following persons participated in a Rule 26(f) conference held on December 10, 2013 and on January 16, 2014, by telephone and stipulate to the filing of this report:

Alan Schoenfeld and Andrew Sokol, of Wilmer Cutler Pickering Hale and Dorr LLP, representing Plaintiff Ophelia Delonta;

J. Michael Parsons, of the Office of the Attorney General, representing Defendants.

2. Upon Defendants' consent, Plaintiff will file an amended complaint no later than January 31, 2014. Defendants reserve their rights with respect to that amended complaint.

3. Discovery Plan

(a) Initial Disclosures

The parties agree that Fed. R. Civ. P. (26)(a) does not require the exchange of initial disclosures in this action because this action falls within a category exempted from that requirement. *See* Fed. R. Civ. P. 26(a)(1)(B)(iv).

(b) Anticipated Discovery

The parties agree that discovery is anticipated on the following topics: Plaintiff's mental and physical health; Defendants' treatment of Plaintiff's physical and mental health, including but not limited to her gender identity disorder (GID); Defendants' policies and practices for

treating GID; Defendants' other policies and practices, to the extent they bear on the treatment of GID.

(c) Interrogatories, Requests for Admission

The parties do not propose to deviate from the limits set forth in the Federal Rules of Civil Procedure at this time, but reserve their rights to seek such amendments at a later date if the need arises and for good cause.

(d) Deposition

The parties do not propose to deviate from the limits set forth in the Federal Rules of Civil Procedure at this time, but reserve their rights to seek such amendments at a later date if the need arises and for good cause.

Plaintiff intends to notice depositions of the following individuals: Meredith Cary, Jeena Porterfield, Lisa Lang, Harold Clarke, Larry Edmonds, Dr. Fred Schilling, Major C. Davis, and Dr. Stephen Levine. Defendants intend to notice the deposition of Plaintiff and Plaintiff's expert Dr. George Brown. The parties agree to cooperate in the scheduling of the aforementioned depositions.

4. Case Management Schedule

Event	Proposed Date
Deadline for completion of discovery, fact and expert	April 4, 2013
Motions for summary judgment due	April 25, 2014
Opposition to motions for summary judgment due	May 16, 2014
Replies in support of summary judgment due	May 30, 2014
Hearing on summary judgment	At the Court's convenience; the parties are available during the weeks of June 16, 2014

5. Settlement

The parties have conferred and do not believe there is any prospect for settlement of this matter.

DATED: January 27, 2014

WILMER CUTLER PICKERING
HALE AND DORR LLP

By: /s/ Don Bradford Hardin, Jr.

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Counsel for Plaintiff Ophelia Azriel De'lonta

DATED: January 27, 2014

OFFICE OF THE ATTORNEY GENERAL

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Counsel for Defendants Harold Clarke, et.al

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of January, 2014, a true and correct copy of the foregoing Report of the Parties' Rule 26(f) Conference was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all Counsel of Record.

By: /s/ Don Bradford Hardin, Jr.
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